

## **EXHIBIT 45**

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IN RE NATIONAL PRESCRIPTION OPIATE LITIGATION

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaaron Polster

THIS RELATES TO:

THE COUNTY OF CUYAHOGA, OHIO, ET AL VS. PURDUE  
PHARMA L.P., ET AL CASE NUMBER 18-OP-45004

VIDEO DEPOSITION OF

CLAIRE KASPAR

JANUARY 15, 2019

DEPOSITION HELD AT KELLEY & FERRARO

950 MAIN AVENUE, SUITE 1300

CLEVELAND, OH 44113

1       in mortality attributable to accidental overdose in  
2       association with substance abuse. Our results in  
3       Cuyahoga County indicate that while OPR deaths have  
4       reason in recent years, the most dramatic rise in  
5       accidental drug deaths has been due to heroin. As  
6       DAH, and again, that's death attributable to heroin,  
7       right?

8           A       Uh-huh.

9           Q       As DAH in Cuyahoga County have risen, our  
10       data indicate that OPR deaths appear to have reached  
11       a plateau. This suggests that the addicted  
12       population may be transitioning to heroin, possibly  
13       for cost and/or availability reasons.

14               Little evidence has been published  
15       documenting transitions from OPR to heroin, but  
16       given the similar pharmacological effects of the  
17       two, this shifting trend in mortality is disturbing  
18       and requires further monitoring on a national level.

19               Did I read that correctly?

20           A       Yes.

21           Q       So is it true that at this time Cuyahoga  
22       County the largest driver of overdose deaths was  
23       heroin?

24           A       Yes.

25           Q       And in looking at the next paragraph it

1 Q So the vast majority of the chart it looks  
2 like it is at zero and then all of the sudden,  
3 again, between 2015 and 2016, there's a dramatic  
4 spike.

5 Do you see that?

6 A Yes.

7 Q And this purple line represents  
8 carfentanil?

9 A Yes.

10 Q And from 2015 to 2016 it goes from zero  
11 overdose deaths to 56 carfentanil deaths?

12 A Yes.

13 Q From 2016 to 2017 looks like there were,  
14 jumped again from 56 carfentanil overdose deaths to  
15 191 carfentanil overdose deaths?

16 A Yes.

17 Q So based on this chart, is it fair to say  
18 the vast majority of the overdose deaths you have  
19 been seeing in recent years have been attributable  
20 to heroin, cocaine, carfentanil and Fentanyl?

21 A Can you reask that question?

22 | Q Sure. Um, we can broaden the question.

23 Based on your experience at CCMEO in recent years  
24 say from 2015 going forward, the drugs that have  
25 been primarily responsible for the vast majority of

1      overdose deaths have been heroin, cocaine,  
2      carfentanil and Fentanyl, is that accurate?

3            A      That is accurate. I just want to point  
4      out that a number of these cases have multiple of  
5      those drugs involved.

6            Q      Uh-huh.

7            A      So when you are seeing these numbers, it  
8      is not that 492 were only Fentanyl, you know what  
9      I'm saying? They can have all of those involved.

10          Q      I think I understand what you are saying.  
11         So if we take 2016 as an example to illustrate what  
12      you are saying, if we just added up, for instance,  
13      the numbers of Fentanyl, heroin, cocaine, and  
14      carfentanil, we would get a number that is much  
15      higher than 666 right?

16          A      Yes.

17          Q      There are only 666 overdose deaths in  
18      2016, right?

19          A      Yes.

20          Q      So in reaching that 666 figure, there were  
21      people who overdose on multiple substances, right?

22          A      Yes.

23          Q      Is that what you were trying to explain?

24          A      Multiple substances were included in the  
25      cause of death for these cases.